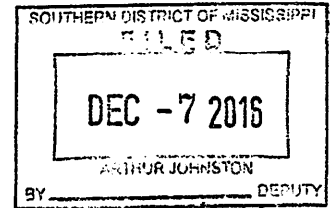


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:16CR 97-HSOJCG

EDWARD MONTRELL BROWN a/k/a "Black"
CHRIS ANTONIO BOLTON
LEARTHUR NICIA SILAS a/k/a "Lil A" a/k/a "A"
MARQUIS COLLINS

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)

The Grand Jury charges:

COUNT 1

That from sometime in January 2014 through the date of this indictment, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **EDWARD MONTRELL BROWN a/k/a "Black", CHRIS ANTONIO BOLTON, LEARTHUR NICIA SILAS a/k/a "Lil A" a/k/a "A" and MARQUIS COLLINS**, did knowingly and intentionally conspire, with each other and others known and unknown to the Grand Jury, to possess with intent to distribute cocaine hydrochloride, a Schedule II narcotic drug controlled substance, cocaine base, commonly known as "crack," a Schedule II narcotic controlled substance, and methamphetamine, a Schedule II narcotic controlled substance, all as prohibited by Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code.

**QUANTITY OF CONTROLLED SUBSTANCES INVOLVED IN THE
CONSPIRACY**

With respect to **EDWARD MONTRELL BROWN a/k/a "Black"**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is a detectable amount of cocaine hydrochloride, a detectable amount of cocaine base, and in excess of 500 grams of a detectable amount of methamphetamine

in violation of Sections 841(b)(1)(A) and (C), Title 21, United States Code.

With respect to **CHRIS ANTONIO BOLTON**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is a detectable amount of cocaine hydrochloride in violation of Section 841(b)(1)(C), Title 21, United States Code.

With respect to **LEARTHUR NICIA SILAS a/k/a "Lil A" a/k/a "A"**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is in excess of 500 grams of a detectable amount of methamphetamine in violation of Section 841(b)(1)(A), Title 21, United States Code.

With respect to **MARQUIS COLLINS**, the amount involved in the conspiracy attributable to him as a result of his conduct, and the conduct of other conspirators reasonably foreseeable to him, is a detectable amount of cocaine hydrochloride, a detectable amount of cocaine base, and in excess of 50 grams of a detectable amount of methamphetamine violation of Sections 841(b)(1)(B) and (C), Title 21, United States Code.

COUNT 2

That on or about January 23, 2014, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **CHRIS ANTONIO BOLTON**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 3

That on or about May 16, 2014, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **CHRIS ANTONIO BOLTON**

and **EDWARD MONTRELL BROWN a/k/a “Black”**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 4

That on or about January 29, 2015, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **EDWARD MONTRELL BROWN a/k/a “Black”**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a detectable amount of cocaine base, commonly known as “crack,” a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 5

That on or about May 12, 2015, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **EDWARD MONTRELL BROWN a/k/a “Black” and MARQUIS COLLINS**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 6

That on or about May 26, 2015, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **EDWARD MONTRELL BROWN a/k/a “Black” and MARQUIS COLLINS**, aided and abetted by others known and

unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a detectable amount of cocaine base, commonly known as “crack,” a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 7

That on or about September 29, 2015, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **EDWARD MONTRELL BROWN a/k/a “Black”** and **LEARTHUR NICIA SILAS a/k/a “Lil A” a/k/a “A”**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute more than 50 grams of a detectable amount of methamphetamine, a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 8

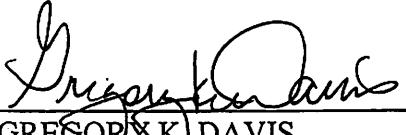
That on or about September 20, 2016, in Greene County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **LEARTHUR NICIA SILAS a/k/a “Lil A” a/k/a “A”**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute more than 50 grams of a detectable amount of methamphetamine, a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all

property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of any of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 853, Title 21, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:

s/signature redacted
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 7th day of December, 2016.


UNITED STATES MAGISTRATE JUDGE